

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY


Mailing Online Services

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Docket No. MC98-1

INSTITUTIONAL RESPONSE OF PITNEY BOWES TO
FIRST INTERROGATORY OF USPS (USPS/PB-1)

Pitney Bowes Inc. ("PB") hereby responds to the first interrogatory of the Postal Service. In order to meet the response schedule agreed upon by counsel to the parties, the response is being faxed to the Postal Service. The question is set forth and is followed by the response.

Respectfully submitted,

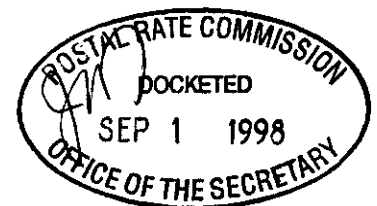


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September 1, 1998

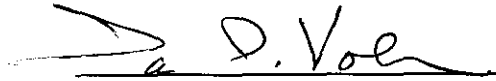


Question: USPS/PB-1. Pursuant to Rule 25 (39 C.F.R. §3001.25), please "identify each person whom [Pitney Bowes] expects to call as a witness at the hearing and state the subject matter on which the witness is expected to testify."

Response: Pitney Bowes intends to present testimony of Mr. Patrick Brand, an officer of the company with responsibilities for Pitney Bowes Directnet Service. Mr. Brand will testify as to the functional and operational characteristics of Pitney Bowes' Directnet Service in response to the testimony of Postal Service Witness Garvey at Tr. 367-71, and the testimony of Witnesses Plunkett and Garvey concerning discounts available to Mailing Online users.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the United States Postal Service in this proceeding in accordance with sections 12 and 20(c) of the rules of practice.


Ian D. Volner